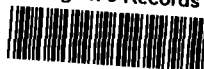


RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Amoco Oil- Main Plant  
(B) Street: OLD ST LOUIS ROAD  
(C) City: WOOD RIVER (D) State: Illinois (E) Zip Code: 62095  
(F) Phone: 618-251-2249 (G) County: Madison  
(H) Operator: Amoco Oil  
(I) Street: P.O. Box 182  
(J) City: Wood River (K) State: Illinois (L) Zip Code: 62095  
(M) Phone: 618-251-2249 (N) County: Madison  
(O) Owner: SAME AS OPERATOR  
(P) Street: \_\_\_\_\_  
(Q) City: \_\_\_\_\_ (R) State: \_\_\_\_\_ (S) Zip Code: \_\_\_\_\_  
(T) Phone: \_\_\_\_\_ (U) County: \_\_\_\_\_  
(V) Date of Inspection: 10/16/84 (W) Time of Inspection (From) 9:30 (To) 11:30  
(X) Weather Conditions: Cloudy, 60°

EPA Region 5 Records Ctr.



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(Y)	Person(s) Interviewed	Title	Telephone
	<u>Ed Sullivan</u>	<u>Env. Consultant</u>	<u>312-856-5858</u>
	<u>Dick Sumner</u>	<u>Env. Engineer</u>	<u>618-251-2228</u>
(Z)	Inspection Participants	Agency/Title	Telephone
	<u>SAME AS ABOVE</u>		
	<u>Pat McCarthy</u>	<u>IEPA/EPS</u>	<u>618-345-4606</u>
	<u>Mike Grant</u>	<u>IEPA/LSCT</u>	<u>618-345-4606</u>
(AA)	Preparer Information		
	Name	Agency/Title	Telephone
	<u>Mike Grant</u>	<u>IEPA/LSCT</u>	<u>618-345-4606</u>

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- |   |  |
|---|--|
| <p><input checked="" type="checkbox"/> A. Storage and/or Treatment</p> <p>1. Containers (I)</p> <p><input checked="" type="checkbox"/> 2. Tanks (J)</p> <p><input checked="" type="checkbox"/> 3. Surface Impoundments (K)</p> <p>4. Waste Piles (L)</p> <p><input type="checkbox"/> B. Land Treatment (M)</p> <p><input type="checkbox"/> C. Landfills (N)</p> | <p><input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P)</p> <p><input checked="" type="checkbox"/> E. Chemical, <u>Physical</u>, and Biological Treatment (Q)</p> |
|---|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

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## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

A reinspection was conducted at this facility for several reasons. The main purpose of the visit was to review daily inspection records concerning the "spray pond". Amoco's response to our CIL indicated that these records were available, which was not our understanding during the initial inspection. Also, it became obvious while reading the response from Amoco that some clarification was necessary regarding other units.

Other inspection records were not being maintained during our initial inspection. These records pertained to weekly inspections of the tanks and daily inspections of the South Flare Pit. Mr. Sumner showed us daily inspection records for the South Flare Pit, which are now being conducted. We also told them that the structural integrity of the two tanks must be inspected weekly. Even though all the liquids have been removed, these inspections must be conducted weekly due to the hazardous waste residues still contained within them. These inspections must continue until the closure plan is approved and closure is initiated. Mr. Sumner said he would start conducting weekly inspections and continue to do so until the closure plan is approved.

The revised Contingency Plan was not completed nor submitted to the local authorities, at the time of this visit. Mr. Sumner said the letters to the local authorities and their responses would be submitted to us.

The revised Part A withdrawing the water softening solids pits had been submitted to USEPA. Amoco also said when a response is received from USEPA a copy would be sent to our office.

Another area in need of clarification was the storage of reactive waste in impoundments. Amoco's response stated that reactive waste was rendered non-reactive immediately upon placement in the impoundments. We discussed with Mr. Sullivan and Mr. Sumner their Part A and their recently submitted closure plan, which showed S04, the storage of reactive waste in an impoundment. We asked Amoco if T04, Treatment of a Reactive waste in an impoundment would not have been a more accurate description of this waste management activity. Mr. Sullivan concurred and asked if a revised Part A was necessary. We told them to contact the Permit Section to see if it was necessary for their closure plan to get approved.

All outstanding apparent violations were discussed and were better clarified. We requested Amoco to supply a letter to us that would supplement their original response to our CIL giving the additional information discussed during our visit. Mr. Sullivan said this would be done and submitted to our office within the month.

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Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

8/6/84

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

J  
TANKS

Facility Name: Amica Plant

Date of Inspection: 8/6/84

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? ☒
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? NA
3. Do continuous feed systems have a waste-feed cutoff? NA
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? NA
5. Are required daily and weekly inspections done? ☒
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) ☒
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) NA

Tanks contain only residues awaiting cleanup approval to be removed. However tank integrity should be inspected because tank residue is still a haz. wa.

\*Not Inspected

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Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? YES

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K  
SURFACE IMPOUNDMENTS

Facility Name: Amoco - Main Plant

Date of Inspection: 8/2/84

- |  |           |  |
|--|-----------|--|
| 1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?  | <u>✓</u>  | _____  |
| 2. Do earthen dikes have protective covers?  | <u>✓</u>  | _____  |
| 3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?  | <u>NA</u> | _____  |
| 4. Is the freeboard level inspected at least daily?  | <u>✓</u>  | <u>Spray Pond, South Flare pit, 2 H<sub>2</sub>O softening S.P. Pits not inspected daily.</u>  |
| 5. Are the dikes inspected weekly for evidence of leaks or deterioration?  | <u>✓</u>  | <u>2 water softening S.P. Pits not inspected weekly.</u>   |
| 6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | <u>✓</u>  | <u>Spray Pond's sludge is classified as DQX by Amoco. (Substance) South Flare pit is said contain DQX (ignitable) and H<sub>2</sub>S (a listed react waste).</u> |
| 7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)   | <u>NA</u> | _____  |

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## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

On August 6, 1984, an inspection was conducted at the Amoco Main Plant Facility in Wood River, Illinois by Pat McCarthy and myself. Ed Sullivan and Dick Sumner accompanied us representing Amoco. Most of the waste generated at the facility came from the refinery operations which closed down in May of 1981. Most of the hazardous waste management areas have been sitting idle since that time.

Amoco recently submitted a closure plan for this facility. The only activity occurring during our inspection was the Calcium Oxide bag water soaking. This occurs in a dumpster by soaking the bags thoroughly with water to use up the heat generated by the calcium oxide which could cause the paper bags to ignite. Most of the apparent violations observed were a result of the facility's failure to continue inspecting the existing regulated units until the final closure plan has been approved.

Apparent violations observed this date are as follows:

725.115  
725.152(c)  
725.173(b)(5)  
725.294(d)  
725.326(a)(b)  
725.329(a)

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